

U.S. DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF ILLINOIS, EAST ST. LOUIS DIVISION

YOLANDA JACKSON, as Administrator of
the Estate of KEVIN CURTIS, #Y22898,

Plaintiff,

v.

Case Number 3:20-cv-00900-DWD

WEXFORD HEALTH SOURCES, INC., EVA
LEVEN, MOHAMMED SIDDIQUI, GAIL
WALLS, NICKOLAS MITCHELL,
CHARLES FRERKING, JEREMY FRERICH,
and ANDREW BENNETT,

Defendants.

MOTION FOR HIPAA QUALIFIED PROTECTIVE ORDER

COME NOW Defendants WEXFORD HEALTH SOURCES, INC., DR. EVA LEVEN,
AND DR. MOHAMMED SIDDIQUI, by and through their attorneys, CASSIDAY SCHADE
LLP, and pursuant to 42 U.S.C. § 1320 and 45 C.F.R. Parts 160 and 164 (HIPAA), move this
Court for entry of a Qualified Protective Order. In support thereof, Defendants state as follows:

1. Plaintiff has filed this cause of action in which the medical condition and
treatment of Plaintiff, KEVIN CURTIS, #Y22898, is at issue.

2. Pursuant to 45 C.F.R. 164.512 of the Health Insurance Portability and
Accountability Act (HIPAA), a HIPAA Qualified Protective Order is necessary to allow the
parties to this litigation to obtain and use protected health information pursuant to HIPAA for the
purpose of this litigation while preventing unauthorized disclosure of said protected health
information.

3. The attached HIPAA Qualified Protective Order should be entered to protect the protected health information from unauthorized disclosure while still permitting its use solely for purposes of this litigation.

WHEREFORE, Defendants WEXFORD HEALTH SOURCES, INC., DR. EVA LEVEN, AND DR. MOHAMMED SIDDIQUI, pursuant to 42 U.S.C. § 1320 and 45 CFR Parts 160 and 164 (HIPAA), respectfully request this Court enter a Qualified Protective Order and for any other relief as deemed just.

Respectfully submitted,

CASSIDAY SCHADE LLP

By: /s/ Jaclyn A. Kinkade

One of the Attorneys for Defendants
WEXFORD HEALTH SOURCES, INC., DR.
EVA LEVEN, AND DR. MOHAMMED
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CERTIFICATE OF SERVICE

I hereby certify that on November 10, 2020, I electronically filed the foregoing Motion for HIPAA Qualified Protective Order with the Clerk of the Court using the CM/ECF system.

The

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/s/ Jaclyn A. Kinkade

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